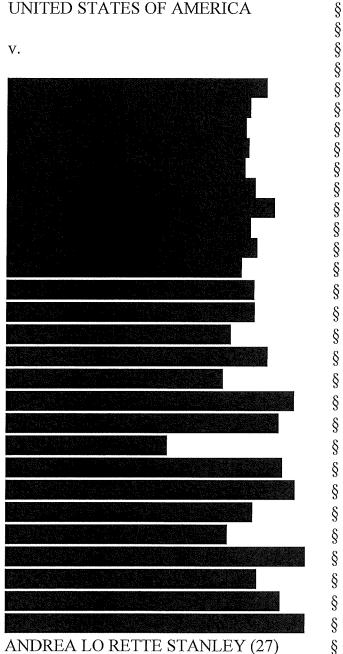
# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

UNITED STATES OF AMERICA

v.



**SEALED** 

No. 4:18CR131 Judge Crone

FEB - 6 2019

Clerk, U.S. District Court Texas Eastern

#### THIRD SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

#### **Count One**

Violation: 18 U.S.C. §§ 1951 and 2 (Conspiracy to Interfere with Interstate Commerce by Robbery, Aiding and Abetting)

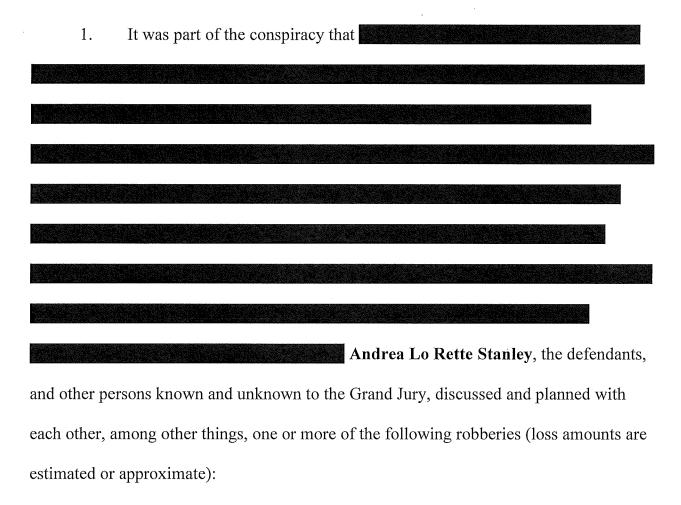
#### THE CONSPIRACY

From on or about August 1, 2017, and continuing through on or about January 9, 2019, in the Eastern District of Texas and elsewhere, Andrea Lo Rette Stanley, the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit a certain offense against the United States, to wit: interference with commerce by robbery, in violation of 18 U.S.C. §§1951 and 2.

# **OBJECT OF THE CONSPIRACY**

The object of the conspiracy was to unlawfully take and obtain personal property, consisting of United States currency, from the persons and in the presence of employees, owners, and agents of businesses against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons and property.

## MANNER AND MEANS



#	Date	Federal District	Bank/Vendor	City	State	Loss Amount	Victim
1	7/22/2017	SDTX	Chase/NCR	Houston	Texas	\$20,000	NCR
2	8/25/2017	SDTX	Chase/NCR	Houston	Texas	\$80,000	NCR

3	9/7/2017	SDTX	Chase/NCR	Houston	Texas	\$0	NCR
4	9/15/2017	SDTX	BOA/Garda	Houston	Texas	\$79,920	
5	9/25/2017	SDTX	BOA/NCR	Houston	Texas	\$77,380	ВОА
			·				Wells
6	9/28/2017	SDTX	Wells Fargo/NCR	Houston	Texas	\$0	Fargo
							Wells
7	9/30/2017	SDTX	Wells Fargo/NCR	Houston	Texas	\$39,940	Fargo
8	10/2/2017	SDTX	BOA/NCR	Houston	Texas	\$39,900	BOA
9	10/5/2017	SDTX	Chase/NCR	Houston	Texas	\$60,000	NCR
10	10/9/2017	SDTX	Chase/Burroughs	Houston	Texas	\$0	
11	10/12/2017	SDTX	BOA/Diebold	Houston	Texas	\$0	ВОА
12	10/13/2017	SDTX	BOA/NCR	Houston	Texas	\$29,500	NCR
							Wells
13	10/17/2017	WDTX	Wells Fargo/NCR	Austin	Texas	\$96,807	Fargo
14	10/19/2017	SDTX	BBVA/Diebold	Lake Jackson	Texas	\$62,320	BBVA
15	10/23/2017	SDTX	BOA/NCR	Houston	Texas	\$40,000	
			Bank of America				
16	10/24/2017	SDTX	(Arrest)	Houston	Texas	\$109,220	ВОА
17	11/10/2017	SDTX	Chase/Hyosung	Sugarland	Texas	\$10,072	
18	11/10/2017	NDTX	BOA/Diebold	Dallas	Texas	\$99,440	ВОА
			Wells			,	Wells
19	11/16/2017	WDTX	Fargo/Diebold	Selma	Texas	\$188,870	Fargo
						,,	Wells
20	12/1/2017	NDTX	Wells Fargo/NCR	Garland	Texas	\$47,950	Fargo
21	12/7/2017	NDTX	BOA/NCR	Garland	Texas	\$159,730	ВОА
22	12/9/2017	WDTX	BOA/NCR	San Antonio	Texas	\$41,940	ВОА
23	12/19/2017	WDTX	Chase/NCR	San Antonio	Texas	\$95,140	NCR
24	12/20/2017	WDTX	Attempt	Austin	Texas	Attempt	None
							Wells
25	12/29/2017	WDTX	Wells Fargo/NCR	Harker Heights	Texas	\$141,780	Fargo
26	1/3/2018	WDTX	Chase (Arrest)	Austin	Texas	Arrest	None
27	1/3/2018	WDTX	BOA/Diebold	San Antonio	Texas	\$109,000	BOA
	1/18/2018		BOA/NCR	Allen		\$53,020	BOA
28	1/10/2019	EDTX	BOAJINCK	Alleli	Texas	ا کان <sub>ا</sub> ددر	Wells
29	1/23/2018	SDTX	Wells Fargo/NCR	Houston	Texas	\$0	Fargo
	2,20,2010		1101010100711011	451011		70	Wells
30	1/29/2018	EDTX	Wells Fargo/NCR	McKinney	Texas	\$67,150	Fargo
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				· ·	Wells
31	1/30/2018	NDGA	Wells Fargo/NCR	Decatur	Georgia	\$103,640	Fargo
32	2/6/2018	SDTX	Chase/NCR	Laredo	Texas	\$88,220	NCR

					North		   Wells
33	3/8/2018	WDNC	Wells Fargo/NCR	Mooresville	Carolina	\$213,930	Fargo
							Wells
34	3/29/2018	NDGA	Wells Fargo	Conyers	Georgia	\$120,076	Fargo
35	5/2/2018	WDMO	US Bank/Diebold	Blue Springs	Missouri	\$105,170	Diebold
36	5/8/2018	NDGA	BOA/Diebold	Atlanta	Georgia	\$88,000	BOA
							Wells
37	5/9/2018	WDTN	Wells Fargo/NCR	Memphis	TN	\$109,020	Fargo
			Regions				Regions
38	6/1/2018	WDAR	Bank/NCR	Nashville	Arkansas	\$63,480	Bank
39	6/7/2018	WDTX	BOA/NCR	San Antonio	Texas	\$72,420	BOA
40	7/19/2018	CDMO	BOA/Diebold	St. Louis	Missouri	\$68,560	BOA
41	7/31/2018	SDTX	Amegy/Diebold	Houston	Texas	\$17,260	Diebold
42	8/2/2018	EDTX	BOA/NCR	Plano	Texas	\$120,427	ВОА
43	8/9/2018	NDIL	Chase/NCR	Norridge	Illinois	\$100,780	NCR
							Capital
44	8/14/2018	EDTX	Capital One/NCR	Texarkana	Texas	\$70,855	One
45	9/13/2018	NDTX	BB&T/NCR	Dallas	Texas	\$34,903	BB&T
46	10/8/2018	MDFL	Chase/NCR	Orlando	Florida	\$33,620	NCR
			Reliance				
47	10/26/2018	СДМО	Bank/NCR (Attempt/Arrest)	St. Louis	Missouri	\$17,130	None
	10/20/2010	CDIVIO	(Accentipe) Farest)	Estimated/Approximate	1411330411	717,130	IVOIC
				Total		\$2,779,430	

At all times during the course and scope of the conspiracy, the above-mentioned businesses conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as contemplated by 18 U.S.C. §1951.

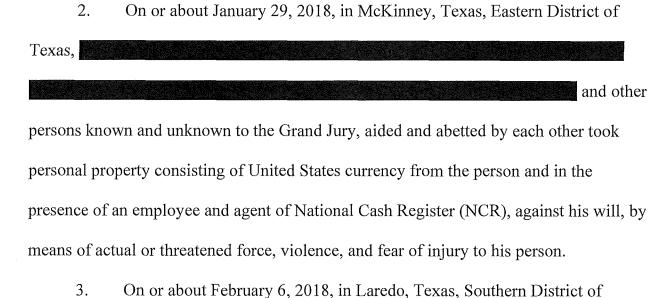
- 2. It was further part of the conspiracy that the defendants and others known and unknown to the Grand Jury formulated a plan and agreement, which, among other things, included:
  - a. the acquisition of United States currency;

- b. the acquisition of property for use in committing robbery;
- c. the timing and means of transportation to commit robbery;
- d. the roles of participation during the preparation for and commission of robbery;
- e. plans to avoid detection and apprehension by law enforcement.

## **OVERT ACTS OF THE CONSPIRACY**

To effect the object of the conspiracy,
Andrea Lo Rette Stanley, the defendants,
and other persons known and unknown to the Grand Jury, committed overt acts within
the Eastern District of Texas, and elsewhere, including, but not limited to, the following:
1. On or about January 18, 2018, in Allen, Texas, Eastern District of Texas,
TO THE CONTRACTOR OF THE PROPERTY OF THE CONTRACTOR OF THE CONTRAC
, and other persons
known and unknown to the Grand Jury, aided and abetted by each other took personal

property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.



Texas,

and other

persons known and unknown to the Grand Jury, aided and abetted by each other took

personal property consisting of United States currency from the person and in the

presence of an employee and agent of National Cash Register (NCR), against his will, by

means of actual or threatened force, violence, and fear of injury to his person.

4. On or about August 2, 2018, in Plano, Texas, Eastern District of Texas,

and other persons
known and unknown to the Grand Jury, aided and abetted each other took personal

Third Superseding Indictment/Notice of Penalty Page 7

property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

5. On or about August 14, 2018, in Texarkana, Texas, Eastern District of Texas,

and
other persons known and unknown to the Grand Jury, aided and abetted by each other took personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

All in violation of 18 U.S.C. §§1951 and 2.

#### Count Two

Violation: 18 U.S.C. §§ 1951(a) and 2 (Interference with Interstate Commerce by Robbery and Aiding and Abetting)

On or about January 18, 2018, in Allen, Texas, Eastern District of Texas,

abetted by each other, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay and affect, commerce, as that term is defined in 18 U.S.C. § 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain, and attempt to take and obtain personal property consisting of United States currency from the person

and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

## **Count Three**

Violation: 18 U.S.C. §§ 1951(a) and 2 (Interference with Interstate Commerce by Robbery and Aiding and Abetting)

On or about January 29, 2018, in McKinney, Texas, Eastern District of Texas,

defendants, aided and abetted by each other, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain, and attempt to take and obtain personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

## **Count Four**

Violation: 18 U.S.C. §§ 1951(a) and 2 (Interference with Interstate Commerce by Robbery and Aiding and Abetting)

On or about August 2, 2018, in Plano, Texas, Eastern District of Texas,

the defendants, aided

and abetted by each other, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain, and attempt to take and obtain personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

#### **Count Five**

Violation: 18 U.S.C. §§ 1951(a) and 2 (Interference with Interstate Commerce by Robbery and Aiding and Abetting)

On or about August 14, 2018, in Texarkana, Texas, Eastern District of Texas,
the
defendants, aided and abetted by each other, did unlawfully obstruct, delay, and affect,
and attempt to obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C.
§ 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain,
and attempt to take and obtain personal property consisting of United States currency
from the person and in the presence of an employee and agent of National Cash Register

(NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

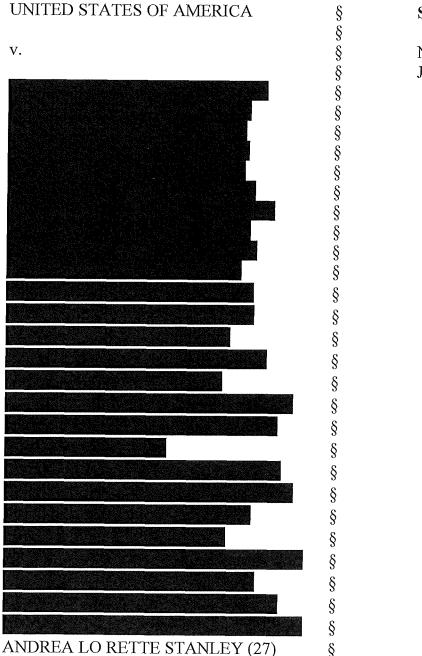
## **NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offense charged in this Third Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

·	A TRUE BILL
	GRAND JURY FOREPERSON
JOSEPH D. BROWN UNITED STATES ATTORNEY	
ERNEST GONZALEZ Assistant United States Attorney	Date

# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION



## **SEALED**

No. 4:18CR131 Judge Crone

# **NOTICE OF PENALTY**

# **Counts One thru Five**

Violation:

18 U.S.C. §§1951 and 2

Penalty:

Imprisonment for a term of not more than twenty years; a fine not to exceed

\$250,000.00; or twice the gross pecuniary gain to the defendant or twice the

gross pecuniary loss to the victim, whichever is greatest; and supervised

release of not more than three years.

Special Assessment: \$100.00